

# **EXHIBIT A**

**EXHIBIT A****PEM's Proposed Case Discovery Plan<sup>2</sup>**

<b>Event</b>	<b>PEM's Proposed Date</b>
Case Management Conference	February 29, 2008
PEM to Serve Disclosure of Asserted Claims and Preliminary Infringement Contentions for Patents-in-Suit	March 10, 2008
Parties Endeavor to Complete Document Productions	March 28, 2008
Mediation Conducted	Week of March 31 or April 7, 2008
Pencom to Serve Preliminary Invalidity Contentions	April 24, 2008
Parties to Exchange Proposed Terms and Claim Elements for Construction	May 5, 2008
Parties to Exchange Preliminary Claim Constructions and Extrinsic Evidence	May 25, 2008
Parties to file Joint Claim Construction and Prehearing Statement (Including Points of Novelty)	July 7, 2008
Parties Complete Claim Construction Discovery	August 6, 2008
Opening Claim Construction Briefs Filed	September 22, 2008
Responsive Claim Construction Briefs Filed	October 1, 2008
Replies in Support of Claim Construction Brief Filed	October 8, 2008
Claim Construction Prehearing Conference	Week of October 20, 2008 (if the Court deems appropriate)
Claim Construction Hearing	Week of October 27, 2008
Fact Discovery Cut-Off	November 28, 2008
Parties to Serve Expert Disclosures	December 8, 2008

<sup>2</sup> PEM reserves the right to modify these deadlines to accommodate Patent L.R. 3-5 should it become necessary.

Event	PEM's Proposed Date
Parties to Serve Rebuttal Expert Disclosures	January 8, 2009
Expert Discovery Cutoff	February 2, 2009
Parties to File Dispositive Motions and <i>Daubert</i> Motions	February 23, 2009
Parties to Identify Trial Witnesses and Trial Exhibits	March 9, 2009
Parties to file Motions <i>in</i> <i>limine</i>	April 8, 2009
Pretrial Conference	April 8, 2009
Jury Selection	April 9, 2009
Trial	April 16, 2008